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**VIA ECF**

Hon. Lorna G. Schofield  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

February 27, 2017

United States v. Carlos ZAVALA VELASQUEZ, et al.  
15 Cr. 174 (LGS)

Dear Judge Schofield:

I am the attorney of record representing Mr. Zavala Velasquez in this matter. I submit this letter on behalf of all defense counsel for the purpose of requesting an extension of time by which we are to file motions on behalf of our respective clients, and for the Court to set a new schedule accordingly. We are currently scheduled to file by March 3, 2017. The government consents to this request.

The primary reason why additional time is required is that we are still waiting for the production of certain discovery materials. As the Court is aware, we have sought additional discovery from the government, as referenced in the motions already filed. These materials would inform the investigation on behalf of our respective clients and other possible pre-trial motions.

As the Court is also aware, the government has sought an extensive amount of material in its MLAT letter, which is also addressed in our discovery motions pending before the Court. The government advises that it expects to start receiving responses in the next few weeks and that it will make at least some of this material available to defense counsel. This material will also inform our motion practice.

Further with regard to pre-trial motions, the Court should know that the government recently provided all defense counsel with copies of statements made to the authorities by various defendants. The defense therefore requires additional time to consider whether to file motions to sever.

Once discovery is finally complete, we propose allowing the defense thirty (30) days in which to file motions. The government could have three weeks in which to respond, and the defense a week to reply. This schedule would adhere to that originally ordered by the Court.

Finally, the Court should be aware that a number of the defendants have begun having plea discussions with the government. Clearly, for those defendants who wish to dispose of their cases without the need for trial, an adjusted motion schedule would greatly facilitate this process.

We are currently scheduled to appear before the Court for a status conference on March 8, 2017 at 11:00am. No doubt the parties can take up the question of scheduling at that time. In the interim, we simply ask that the Court not require us to file motions until a new order is in place.

Respectfully submitted,



HOWARD LEADER

cc: Emil J. Bove III, Esq.  
Matthew J. Laroche, Esq.  
Assistants United States Attorney

(VIA EMAIL AND ECF)

All defense counsel of record

(VIA EMAIL AND ECF)

The deadline for the filing of non discovery motions is extended to March 16, 2017 nunc pro tunc from March 3, 2017. This application will be addressed at the status conference currently scheduled for March 16, 2017. In preparation for this conference, the parties shall file a joint letter itemizing any outstanding discovery by March 13, 2017. The parties are reminded that discussions regarding the possible disposition of this matter will not stay any schedule set by this Court. The Clerk of the Court is directed to terminate the letter motion at socket number 111.

Dated: March 6, 2017  
New York, New York

SO ORDERED



HON. LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE